
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION
FOR A DECLARATORY RULING
DETERMINING IF SOUTH DAKOTA
LAW WOULD ALLOW PETITIONER
TO
DEVELOP AND OWN ITS OWN
RENEWABLE ENERGY GENERATION
SYSTEM

DOCKET NUMBER EL18-061

INTERVENOR
SDREA'S ARGUMENT
REGARDING PETITIONER'S
REQUESTED DECLARATORY
RULING

South Dakota Rural Electric Association ("SDREA"), by and through its attorneys of record, respectfully submits this Argument Regarding Petitioner's Requested Declaratory Ruling. SDREA respectfully submits that Randall Community Water District's ("RWCD") requested declaratory ruling should be denied, or alternatively, that the Commission declare that Randall's proposed renewable energy generation systems would be in violation of SDCL § 49-34A-42. As support, SDREA joins and specifically adopts and incorporates the arguments and authorities set forth by East River Electric Cooperative, Inc. ("East River"), Basin Electric Power Cooperative and Charles Mix Electric Association, Inc. ("Charles Mix"), in their briefing on this matter.

CONCLUSION

For all these reasons, SDREA requests that RCWD's declaratory ruling be denied, or alternatively, that the Commission declare that RCWD's proposed renewable energy generation systems would be in violation of SDCL § 49-34A-42.

Dated this 31 day of January, 2019.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served via electronic filing with the South Dakota Public Utilities Commission and via email on the following individuals:

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